

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

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FUND RECOVERY SERVICES, LLC, a)
Delaware limited liability company, as assignee)
of PRINCETON ALTERNATIVE INCOME)
FUND, L.P., a New Jersey limited partnership,)
)
Plaintiff,) Case No.: 2:21-cv-00093-PPS-JEM
)
v.) Hon. John E. Martin
) United States Magistrate Judge
RAVIV WOLFE, an individual, and)
KATHERINE WOLFE, an individual,)
)
Defendants.)
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PLAINTIFF'S MOTION FOR ONE WEEK EXTENSION

Plaintiff Fund Recovery Services, LLC (“FRS” or “Plaintiff”), as assignee of Princeton Alternative Income Fund, L.P. (“PAIF”) (collectively, “Princeton”), by and through its undersigned counsel, ASHMAN LAW, LLC, respectfully moves this Court for an extension of one week to respond to the *Motion to Dismiss Complaint* (the “Motion to Dismiss”) filed by Defendants Raviv Wolfe (“Raviv”) and Katherine Wolfe (“Katherine”). In support thereof, Plaintiff states as follows:

1. This lawsuit was commenced on March 15, 2021. [Dkt. 1.] After numerous delays and extensions, and after Defendant Raviv Wolfe filed an answer to the complaint [Dkt. 11], Defendants filed the Motion to Dismiss on November 10, 2021. [Dkt. 32.] On December 20, 2021, defense counsel withdrew without objection Raviv’s answer to the complaint, and the Court set January 12, 2022 for Plaintiff to file its response to the Motion to Dismiss or file a motion for leave to file an amended complaint. [Dkt. 35.]¹

¹ Notably, leave to file an amended complaint should not be required, as Plaintiff would have had a right under Fed. R. Civ. P. 15(a)(1)(B) to file an amended complaint without separate leave.

2. The Motion to Dismiss raises a number of interesting issues. Considering them has required Plaintiff to review certain records and, of course, perform legal research. Moreover, in determining next steps, the undersigned counsel has had to confer with a number of decision-makers and/or advisors, including lead counsel in a related case pending in federal court in Chicago. This work and coordination has taken some time, delayed a bit by the recent holidays (during which one germane person contracted Covid-19) and the parties' various schedules, so an additional week is required to comply with the Court's Order.

3. Plaintiff has not sought a prior extension in this matter (or in the entirety of the case, it is believed), and the request is not interposed for any dilatory purposes. Plaintiff has also been patient with respect to Defendants' various extensions. No party will suffer any prejudice by the grant of the motion. Plaintiff's counsel has reached out to defense counsel to determine whether Defendants have any objection, but did not hear back by the time of the filing of this motion.

WHEREFORE, for all of the above-stated reasons, Plaintiff Fund Recovery Services, LLC respectfully requests this Court issue an Order affording Plaintiff until January 19, 2022 to file a response to the Motion to Dismiss and/or an amended complaint, and permitting Defendants an additional week, until January 26, 2022, to file a reply thereto; and granting such other and further relief as this Court may deem just and proper.

Dated: January 12, 2022

Respectfully submitted,

FUND RECOVERY SERVICES, LLC, as assignee of
PRINCETON ALTERNATIVE INCOME FUND,
L.P. ,



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CERTIFICATE OF SERVICE

I, Kenneth J. Ashman, certify that on January 12, 2022, true and correct copies of the foregoing was filed electronically through the Northern District of Indiana CM/ECF electronic filing system, which will send a notification of filing to all counsel of record and unrepresented parties.



Kenneth J. Ashman